



GDPR PRIVACY NOTICE

WELCOME TO THE M-SQUARED LASERS LIMITED'S PRIVACY NOTICE

M-Squared Lasers Limited respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format, so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

- | | |
|---|--|
| 1. Important information and who we are | 6. International transfers |
| 2. The data we collect about you | 7. Data security |
| 3. How is your personal data collected | 8. Data retention |
| 4. How we use your personal data | 9. Your legal rights |
| 5. Disclosures of your personal data | 10. Glossary |

1. IMPORTANT INFORMATION AND WHO WE ARE

Purpose of this privacy notice

This privacy notice aims to give you information on how M-Squared Lasers Limited (referred to as “M Squared”, “we”, “us” or “our” in this privacy notice) collects and processes any of your personal data collected on an online or offline context.

Our website (at www.m2lasers.com) is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements any other specific privacy notices and is not intended to override them as to specific content thereof.

Controller

M Squared is the controller and responsible for your personal data.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise [your legal rights](#) please [contact the data privacy manager](#) using the details set out below.

Contact details

Our full details are:

Full name of legal entity: M-Squared Lasers Limited

Address: Venture Building, 1 Kelvin Campus, West of Scotland Science Park, Glasgow, G20 0SP, United Kingdom

Name of data privacy manager: Stuart Malcolm

Email address: privacy@m2lasers.com



You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the United Kingdom supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 25 May 2018 and historic versions can be obtained by contacting us. We may update this notice from time to time by publishing a new version on our website. You should check the website occasionally to ensure you are happy with any changes to this notice.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

If you are reading this on our website, it may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been irretrievably removed (in other words, anonymised).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

Personal data collected through our website, emails or offline:

- **Identity Data** includes title, first name, last name, job title and similar identifiers.
- **Contact Data** includes email address, telephone numbers and address.
- **Profile Data** includes any username and password and any feedback you provide.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

Personal data collected through our website only:

- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
- **Usage Data** includes information about how you use our website.

We also collect, use and share **Aggregated Data** such as statistical data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.



We do not intentionally collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences. Please avoid providing any such information to us.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity and Contact Data by filling in forms or by corresponding with us by email, phone, post or otherwise. This includes personal data you provide when you:
 - make an enquiry about our products or services (whether on your own account or on behalf of your organisation);
 - request marketing to be sent to you;
 - create an account on our website;
 - enter a survey;
 - give us some feedback;
 - email us or respond to an email from us;
 - visit our offices; or
 - call us.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns together with Usage Data. We collect this personal data by using cookies and other similar technologies. Please see our [Cookie Policy](#) for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - Technical Data and Usage Data from the following parties:
 - (a) analytics providers such as Google, Go Squared and Hotjar based outside the EU.
 - Identity and Contact Data from publicly available sources such as third-party websites (based inside and outside the EU), trade conferences and events (based inside and outside the EU) and social media sites, for example, LinkedIn based outside the EU.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

[Click here](#) to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data. You have the right to withdraw consent to marketing at any time by emailing us at opt-out@m2lasers.com.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.



Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To liaise with you (acting on behalf of your organisation) with respect to the promotion, potential sale and sale of our products and services and providing customer and contract management	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (to enable us to liaise with your organisation, through you as its representative/ agent/ conduit, to discuss the sale or potential sale of our products and services and/ or your organisations specific requirements for our products or services) (b) Where an order is placed directly by you as an individual, the performance of a contract with the data subject
To process and deliver your organisation's order for our products or services including: (a) conducting financial transactions including managing payments, fees and charges due from your organisation (b) collecting and recovering money owed to us by your organisation (c) auditing purposes	(a) Identity (b) Contact (c) Marketing and Communications	(a) Necessary for our legitimate interests (to enable us to meet our obligations to your organisation and, reciprocally, to recover any debts due to us from your organisation) (b) Where an order is placed directly by you as an individual, the performance of a contract with the data subject
To enhance our products and services	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (to study how our customers use our products/services)
To manage our relationship with you and your organisation which will include: (a) undertaking business administration functions to facilitate proper account management (b) providing customer support and maintenance services (b) asking you for feedback on our products and services (c) notifying you and your organisation about changes to our business terms, including this privacy notice (d) dealing with complaints	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Necessary for our legitimate interests (to keep our records updated, to study how our customers use our products/services and to undertake customer care) (b) Where an order is placed directly by you as an individual, the performance of a contract with the data subject



Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To enable you to complete a survey/customer feedback	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications (e) Usage	(a) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To operate, facilitate, administer, promote and protect our business, including our website (including system and network security, troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring or due diligence exercise)
To deliver relevant website content and advertisements to you and your organisation and measure or understand the effectiveness of the advertising we serve to you and your organisation	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications (e) Technical (f) Usage	(a) Subject to paragraph (b) below, necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy) (b) Where cookies are utilised to gather non-anonymised personal data, the consent of the data subject in accordance with our Cookie Policy .
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	(a) Subject to paragraph (b) below, necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy) (b) Where cookies are utilised to gather non-anonymised personal data, the consent of the data subject in accordance with our Cookie Policy .
To send you marketing communications, make suggestions and recommendations to you about goods or services that may be of interest to you and your organisation	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications (e) Technical (f) Usage	(a) Necessary for our legitimate interests (to develop our products/services and grow and market our business)
To receive consultancy, professional or other advisory services from you	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (to make full use of the service provided) (b) Where contracts are directly with the individual consultant, the performance of a contract with the data subject (for example, payment of consultants)



Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To receive other services from you or your organisation	(a) Identity (b) Contact	(a) Necessary for our legitimate interests, (being obtaining products or services, administering the contract (e.g. payment), evaluating potential suppliers and general business administration)
To liaise with you in your capacity as a non-executive director, shareholder (or representative thereof) or in respect of our intellectual property protection, exploitation and management	(a) Identity (b) Contact	(a) Necessary to comply with a legal obligation (e.g. obligations per the Companies Act 2006 and the Patents Act 1988)

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. Please see "Opting out" below.

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you or your organisation may want or need, or what may be of interest to you or your organisation. This is how we decide which products, services and offers may be relevant for you and your organisation (we call this marketing).

You will receive marketing communications from us if you have requested information from us or your organisation has purchased goods or services from us and, in each case, you have not opted out of receiving that marketing.

Opting out

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by emailing us at opt-out@m2lasers.com at any time.

Where you opt out of receiving these marketing messages, this will not apply to processing of your personal data which we use for other purposes (please see the table in this paragraph 4 above).

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly. For more information about the cookies we use, please see [Cookie Policy](#).

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).



If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- **Internal Third Parties** as set out in the Glossary.
- **External Third Parties** as set out in the Glossary.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

We share your personal data within the M Squared group of Companies (**M Squared Group**). This will involve transferring your data outside the European Economic Area (**EEA**).

Many of our External Third Parties are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to that personal data by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/eu-us-privacy-shield_en.

Please **contact us** if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7. DATA SECURITY

We have put in place appropriate technical and organisational security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal



data to those employees, agents, contractors and other third parties who have a business need to know. Employees and other third parties processing personal data on our behalf will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our data retention policy which you can request from us by [contacting us](#).

In some circumstances you can ask us to delete your data: see [Request erasure](#) below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- [Request access to your personal data](#)
- [Request correction of your personal data](#)
- [Request erasure of your personal data](#)
- [Object to processing of your personal data](#)
- [Request restriction of processing your personal data](#)
- [Request transfer of your personal data](#)
- [Right to withdraw consent](#)
- [Right to complain to a supervisory authority](#)

If you wish to exercise any of the rights set out above, please [contact us](#).

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.



What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. GLOSSARY

LAWFUL BASIS

Legitimate Interest means the processing of your personal data is necessary for the legitimate interest (which is identified in the table in paragraph 4) of our business or a third party other than where your interests, rights and freedoms override our legitimate interests. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation to which we are subject.

Performance of a contract means processing your personal data where it is necessary for the performance of a contract with you, or, at your request, taking preparatory steps to perform such a contract.

THIRD PARTIES

Internal Third Parties

Other companies in the M Squared Group acting as joint controllers and who are based in the USA and provide and undertake leadership reporting.

External Third Parties

- Service providers acting as processors based in the United Kingdom, the EEA and USA who provide IT, system administration and cloud-based software services.
- Professional advisers acting as processors including lawyers, bankers, auditors and insurers based in the United Kingdom and the USA who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other governmental authorities acting as processors based in the United Kingdom.



YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

Complain to Supervisory Authority. If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

*Version 1
180525 SM*